

**THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF
TEXAS**

DALLAS DIVISION

Elaine Whigham Williams,
Plaintiff

CLERK OF DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
2019 JUL -1 PM 3:18
DEPUTY CLERK
319 - CV 1587 - L

v. CIVIL ACTION NO.
JURY TRIAL DEMANDED

City of Dallas Police
Texas Department of Family Protective Service
Medical City Hospital
Marsh McLennan Companies,
Defendant

COMPLAINT

Comes now, Plaintiff, Elaine Whigham Williams, and files her complaint against
the above-named Defendants on the following grounds:

INTRODUCTION

1.

This is an action to redress the deprivation of Plaintiff rights secured under the Constitution pursuant to 42 U.S.C. 1983.

5.

Under 42 U.S.C 1983 a state and local official can be sued for Deprivation of Rights, privileges and immunity secured under The Constitution. The Suit is brought against State and Local officials under 42 U.S.C 1983.

6.

Section 1983 allows claims alleging the Deprivation of Rights, Privileges and immunity secured by The Constitution.

7.

Plaintiff is suing Defendants Texas Department of Family Protective Service, Medical City Hospital and City of Dallas Police Department under Federal Rights secured under the Fourth Amendment of the U.S. Constitution.

8.

Section 1983 allows Defendants to be found liable when they acted under the color of any statute, ordinance, regulations, custom or usage of any state or territory or

the District of Columbia under 42 U.S.C.1983. Officer Grimes of the Defendant City of Dallas Police Department while acting under the Color of Law and Torrie Millier of Defendant Texas Department of Family Protective Services had the Plaintiff Elaine Whigham Williams falsely arrested and held without a probable cause for a warrant.

9.

The probable clause is essential in the warrant clause under the Fourth Amendment. In determining probable clause...[w]e are concerned with the question whether the affiant had reasonable grounds at the time of his affidavit.

See Dumbra v. United States 268 U.S. 435,439,441.

PARTIES

10.

The Plaintiff Elaine Whigham Williams resides in the State of Georgia in the City of Atlanta. The Plaintiff Elaine Whigham Williams is was born in the United States of America and is a lawful citizen of these United States.

11.

The Plaintiff at all times relative to this Complaint is a respected citizen of her Community, a Christian Minister and a Insurance and Service Professional.

12.

The Defendant Texas Department of Family Protective Services and **Torrie Miller** in his Official Capacity is the Defendant in this Complaint. The Defendant Texas Department of Family Protective Services can be served suit and summons 2600 Lone Star Drive Dallas, Texas 75212.

13.

The Defendant City of Dallas is a municipality and the City involved the acts of its City of Dallas Police Department and **Officer Grimes** in his Official Capacity. The Defendant City of Dallas can be served suit and summons at 1500 Marilla St. Dallas, Texas 75201.

14.

The Defendant Medical City Hospital is a medical hospital. The Defendant Medical City Hospital can be served suit and summons 7777 Forest Lane Dallas, Texas 75230.

15.

The Defendant Marsh McLennan Companies . Defendant Marsh McLennan Companies can be served suit or summons at 1166 Avenue of the Americas New York, New York 10036.

BACKGROUND

16.

Plaintiff Elaine Whigham Williams file this *pro se* Complaint against Texas Department of Family Protective Services and City of Dallas based upon Violation of Rights Under the Color of Law and the Plaintiff presents different and newly discovered information not presented in, *William's v. Marsh McLennan Cos.*, No. 3:18-cv-1035, 2018) or any other complaint filed in this court. The previous Complaints were dismissed under 28 U.S.C. 1915(e)(2)(B) by United States District Court Northern District of Texas and however, Plaintiff pleads upon the Courts mercy for the injustices committed by the Defendants jointly and severally. plaintiff presents a believable and plausible complaint.

17.

First, a complaint must allege facts with specific specificity to state a claim for relief that is plausible, not merely conceivable on its face. "*Bell Atlantic v. Twombly*, 550 U.S. 544 (2007) The Plaintiff presents specific facts to support this claim which takes the claim outside the realm of irrational or the wholly incredible. The Plaintiff ask the court to grant her "equitable tolling of the statute of limitation. The events in this complaint occurred in March 31, 2013 however, in February 2019 Plaintiff became aware that she had suffered a loss under United States Statute, 42 U.S.C. 1983. On June 28, 2019 the Plaintiff became aware that this loss occurred out of the action of an Officer Grimes as a part of the CBP also known as Custom

and Border Patrol in the State of Texas whom had set up an internal checkpoint at the Defendant Medical City Hospital in an attempt to unlawfully separate "families". The Defendants along with Defendant Texas Department of Families became one of 170 internal inland "Custom and Border Patrol Check Points" calling their operation "LA". A misuse of power under 42 U.S.C. 1983 pretending to be members of local law enforcement agencies acting as "peace officers" for Customs and Border Patrol. The applicable two-year limitations period for this action under Texas law states, determines the accrual date of a 1983 under. "*Walker v. Epps*, 550 F.3d 407,414(5th Cir. 2008). The United States Fifth Court of Appeals determined, "the limitations period begins to run' the moment the Plaintiff becomes aware' that he has suffered an injury or 'has sufficient information to know that he has been injured. See. *Piotrowski*. The Plaintiff was unaware that the injury she suffered was due to the wrongdoings of City of Dallas Police Officer Grimes and Defendant Texas Department of Family Protective Service Torrie Miller due to a blatant violation under U.S. statute 42 U.S.C 1983. Under U.S. Statute 42 U.S.C. 1983, Deprivation of Rights Under The Color of Law---every person under the color of any statute, ordinance or regulation custom usage any state territory, caused to be subjected any citizen of The United States to the deprivation of rights of any privileges or immunities secured by The

Constitution shall be liable to the party injured in action at law. The Plaintiff argues that the issue of statute of limitations that arises in this complaint should be toiled. Plaintiff contends with the U.S. Courts regarding the multiple attempts the Plaintiff filed Complaints to obtain justice in U.S. Courts regarding the wrongdoings committed against her has no bearing and should have no bearing on courts granting the Plaintiff equitable tolling of the statute of limitations. Plaintiff contends that dismissing this Complaint and not granting equitable toll of statute of limitations due Plaintiff litigation history is an Obstruction of Justice with sound case law to back up such a claim would result in Court abuse of discretion. Plaintiff further contends the Defendant is in violation of the Fourth Amendment of The United States Constitution which states, "[t]he right of a person to be secure in there persons,house, papers and effects against unreasonable searches and seizures shall not be violated and no Warrant shall issue but upon probable cause supported by Oath or affirmation and particularly describing the place to be searched and the person or things to be searched and the person or things to be seized.

18.

The Plaintiff contends that she was wrongfully held on the night of March 31,2013 without probable cause and the Defendants actions on the night of March 31,2013 was warrantless, unjustifiable and unreasonable.

FACT

19.

Defendant Medical City Hospital operates a Hospital Medical facility located at 7777 Forest Lane Dallas, Texas 75230 . The medical facility includes an acute and urgent care Emergency Department.

20.

Defendant Texas Department of Family Protective Services, is a state of Texas agency which investigates neglect of the elderly or of children.

21.

Defendant City of Dallas, City of Dallas Police Department is a law enforcement agency in the City of Dallas, Texas.

22.

Defendant Marsh McLennan Companies is a full service Global Insurance Risk Management and Brokerage firm.

23.

This Complaint arises out of a Mother's trip to the Emergency Department.

At no time was the Plaintiff Elaine Whigham Williams ever a part or affiliated with any street gang. The Plaintiff was a licensed insurance professional for the state of Texas and a Christian Minister. At all times the Plaintiff was a citizen of The United States of America born in Ramapo, New York.

24.

On January 14, 2013 Plaintiff Elaine Whigham Williams began her employment with Marsh McLennan Companies located at 1717 Main St. Comerica Building Dallas, Texas as a Senior Level Customer Representative. Several weeks after employment, approximately around February 15, 2013, Defendants Marsh McLennans, Vice President Cynthia Hammond went on a 6 weeks leave of absence leaving Plaintiff to be targeted and workplace bullied in the office in an attempt to drive Plaintiff out of the workplace and to sabotage her employment using intimidation and surveillance. The Defendant were successfully able to Sabotage that employment on March 31, 2013 when Defendants used Plaintiff visit to Defendant's Medical City Hospital as a Custom and Border Patrol Internal Checkpoint. The Defendants used Defendants Medical City Hospital as a "sensitive location" as a means abuse power. Plaintiff's is informed and believes Defendant

used Medical City Hospital and Defendant City of Dallas Officer Grimes, used the facility to act as a Custom and Border Protection Agency, to separate Children from their families like an illegal migrant trying to cross the Mexico Border. In this operation Custom Border Protection Agents used fabricated claim of "danger" as reasoning for separating families.

25.

From approximately February 15,2013 to March 31,2013 Plaintiff resided at 12121 Coit Rd Dallas, Texas 75121 approximately one mile from Defendant Medical City Hospital. At no times was any law enforcement called to Plaintiff residence for any issues however, the Plaintiff on several occasions prior to the incident on March 31,2013 Plaintiff saw The Defendant City of Dallas Police what appeared to be in surveillance laying in wait near the Plaintiff residence.

26.

During the time leading up to this incident on March 31,2013 Plaintiff a Senior Level Customer Representative was trying to complete a 90 day probation with Defendant Marsh McLennan Companies.

27.

The Plaintiff Elaine Whigham Williams, went from January 14,2013 to March 31,2013 and experienced weeks of workplace bullying which she believes escalated to Community Mobbing Campaign because the Plaintiff was an African American Black Female.

28.

On March 31,2013 Plaintiff took her minor 12 year old son to Medical City Hospital for Complaints of chest pains.

29.

Plaintiff walked into Medical City Hospital and was triaged by the Emergency Room Triage Nurse a white female. The Plaintiff told the Defendant Medical City Hospital Triage Nurse that her son was having chest pains and the Plaintiff wanted her son seen by a Physicians because the Plaintiff son had ran out of his medicines for ADHD and the Plaintiff felt that this may be the reason for the Plaintiff son's chest pains. The Plaintiff told the Defendant Triage Nurse that she had just moved to the City of Dallas for a job and she did not have family in the area. Plaintiff is informed and believes she was targeted by members of the Defendant Medical City Hospital, Defendant City of Dallas Police Officer Grimes under the United States

Border Patrol "Zero Tolerance" pretending like Plaintiff was a Migrant trying to cross the U.S. Border in an internal "checkpoint" operation at Defendant Medical City Hospital.

The Plaintiff talked to the triage nurse regarding a strange event during a trip to Houston Texas where a two Hispanic men's allowed blood to drip from their finger in a ritualistic ceremony on the City of Houston City Bus.

29.

At no time did the Plaintiff an Professional African American Female make mention of Demons or sacrifices.

30.

The Plaintiff explained to the Defendant Medical City Hospital triage Nurse that her son was being bullied in school and the Plaintiff also stated to the Defendants nurse that she was experiencing some workplace bully and mobbing on the job

The Plaintiff who was also a Christian Minister was carry a Bible to read. The Bible made a comment to the Nurse, that it was "nothing but the devil".

31.

At all times and place the term, "Nothing but the Devil" is a common phrase and is not probable cause for Defendants apprehension without a warrant.

32.

At no time or place was the Plaintiff biligerent, hostile,over emotional or disruptive.Plaintiff son was admitted into the Defendant Medical City Hospital emergency department and Plaintiff and her son was placed in a ER room.

33.

Plaintiff waited for extended amount of time for the Defendants physician to see her son for chest pains and the Plaintiff decided to wait till the next day to see a clinic physician at a urgent or family care center.

34.

When Plaintiff informed the Defendant Medical City Hospital nurse that she would like to sign out an Officer Grimes of Defendant City of Dallas Police Office walked into room on duty, wearing his badge, wearing and police uniform and told

Plaintiff she could not leave and separated Plaintiff from her minor child. The Plaintiff was told she was being "detained" by Officer Grimes who introduced himself as City of Dallas Police Officer.

35

Defendant City of Dallas Police Office and Defendant Tory Miller told Plaintiff she was being seized and could not leave the Hospital because, the Plaintiff carried a Bible, said " God Bless You" and because Plaintiff asked if the Physician could refill her sons medication for hyperactivity until Plaintiff new to Dallas could find her minor child a primary Pediatrician. Plaintiff is informed and believes she was detained to be used in a operation under Custom Border Patrol Checkpoint.

36.

Plaintiff is informed and believes that Defendant City of Dallas Police, Officer Grimes targeted Plaintiff because Plaintiff was a single black female as an opportunity to abuse power.

37.

Plaintiff is informed and believes that Officers Grimes of Defendant City of Dallas Police Department held her without probable cause. The element of probable cause is required before the police can make a arrest, conduct a search or receive a warrant. Courts have found probable cause where there is reasonable basis that a

crime has been committed. The element of exigent circumstances, warrantless arrest are justified when *entry* is necessary to prevent physical harm under circumstances that would cause a **reasonable** person to believe entry was necessary. Defendant Officer Grimes and Defendant Torrie Miller of Texas Department of Family Protective Services actions lack the element of legitimate law enforcement efforts.

38.

Plaintiff is informed and believes that Defendant City of Dallas Police Officer Grimes, Defendant Torrie Miller of Texas Department of Family Protective Services and Defendant Medical City Hospital where not acting on March 31,2013 out of **legitimate** law enforcement efforts.

39.

At approximately 9:00pm to 9:45pm on March 31,2013 Defendant Texas Department of Family Protective Service Officer Torrie Miller working with Defendant City of Dallas Office admitted in sworn affidavits that he was called by,"LA".

40.

Plaintiff is informed that Defendant City of Dallas Police Officer Grimes was a

member of a White Supremacist Secret Organization deeply ceded in the City of Dallas Police Office whom call themselves "LA". The group "LA" is a deputy gang made up of White Nazis who abuse power and terror communities. Officer Grimes Officer Grimes was a member of a neo-Nazi White Supremacist gang. The Group LA is a internal agency operating in sensitive internal Custom and Border Patrol checkpoint against Black African Americans. In an attempt to treat African Americans like an illegal immigrant.

41.

In his Report Defendant Texas Department of Family Protective Service Officer, Torrie Miller states, "LA" requested CPS involvement.

42.

In his sworn affidavit Defendant Texas of Family Protective Services Torrie Miller openly admits to wrongdoing and abuse of power. The Defendant Texas Department of Family Protective Services Torrie Miller openly admits that the Plaintiff was unlawfully held.

42.

Plaintiff is informed and believes Defendant City of Dallas Police Officer, Defendant Texas Department of Family Protective Service. On October 27, 2016 received a letter from Defendant Medical City Hospital, Risk Manager, Tammy Luther with the following statement of the actions of Defendant City of Dallas Police Officer Grimes acting under the Color of Law which proves, Defendant violation of the Plaintiff Fourth Amendment Right, (1) *you were requesting prescription refills for you and your son's anxiety medication. (2) you were "talking" about demons and sacrifices. (3)* "the hospital staff " and "the peace officer" detained " you under an Apprehension by Police Officer Without a Warrant. (4) Concerned about you and your son's safety.* Plaintiff is informed and believes that Defendant Medical City Hospital, Risk Manager Tammy Luther identified Defendant City of Dallas Police Officer Grimes as a "Peace Officer" because he was falsely acting in the line of duty on March 31, 2013 as a member of Custom and Border Patrols, "Peace Officers".

43.

In news media began reporting incidents of corruption and misconduct involving white supremacist police deputies and secret police and police gangs operating out of local city and state police departments as Custom and Border Patrol Agents

calling themselves LA. using Custom and Border Protection Agents to seperate families.

44.

As a direct and proximate result of Defendants conduct,Plaintiff is informed and believes that the Defendants conduct on March 31,2013 led to the Death of her Step Mother Hattie Mae Bailey who died on December 9,2017 from a broken heart because the Defendants wrongful conduct on March 31,2013 and due to the Plaintiff unlawful separation from the Plaintiff son who was Hattie Mae Bailey beloved grandson. Hattie Mae Bailey died waiting for the opportunity to see her beloved grandson and cling to that hope until she took her last breath. Asking "Lane have you talked to Cayman and where is Cayman".

45.

As a direct and proximate result of Defendants violation of the Plaintiff's rights under the Fourth Amendment and under United States 42 U.S.C. § 1983, the Plaintiff has suffered emotional distress, loss of standing on community, damage to reputation, loss of income and damage to future relationships.

46.

STATEMENT OF FACT

The Plaintiff is suing the Defendant's for Deprivation of Rights under The Color of Law 42 U.S.C. 1983 and for monetary damages. The Defendants Texas Department of Family Protective Services and City of Dallas Police Department depreviated the Plaintiffs rights and privileges secured by Fourth Amendment of The United States Constitution. The Fourth Amendment of The United States Constitution is, "*the right of the people to be secure in their persons, house, papers and effects against unreasonable searches and seizures, shall not be violated, no warrant shall issue but upon probable cause supported by Oath and Affirmation*"

Defendants on March 31,2013 violated the Plaintiff Fourth Amendment Right. Plaintiff demands judgment in the amount of \$35,000,000.00. The Plaintiff lost wages, unnecessary medical cost, emotional distress, loss of prestige, humiliation and loss of family support.

COUNT ONE:
42 U.S.C 1983
Deprivation of Rights

47.

Plaintiff incorporates herein paragraph 1 through 46 of her complaint.

48.

The Defendant Texas Department of Family, **Torrie Miller** and Defendant City of Dallas Police, **Officer Grimes**, where state actors acting under the color of law. Defendants Texas Department of Family Protective Services and City of Dallas Police have engaged in.

49.

The Defendant Texas Department of Families, Defendant Medical City Hospital and Defendant Officer Grimes on March 31, 2013 had set up a Customs and Border Control "internal" checkpoint at Defendant Medical City Hospital. Defendant Texas Department of Family Protective Services and Defendant City of Dallas Police Office acts violates United States Statute 42 U.S. 1983. Defendant acts have caused Plaintiff to suffer loss of pay, loss of family, emotional distress, loss

50.

Defendant has engaged in Deprivation of Rights under the Color of Law

COUNT TWO

Violation of The Fourth Amendment of The United States Constitution

51.

Plaintiff incorporates herein Paragraph 1 through 46 of her Complaint

52.

Defendant Texas Department of Family Protective Services and City of Dallas Police and Defendant Medical City Hospital have engaged in the Violation of the Fourth Amendment of the United States Constitution.

53.

Under the Fourth Amendment of The United States Constitution,[t]he right of the people to be secure in persons,houses,papers and effects against unreasonable searches and seizures,shall not be violated, no warrant shall issue, but upon probable cause supported by an oath of affirmation.

54

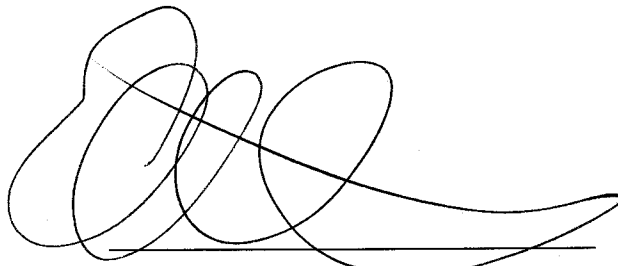
The Defendant's action is the proximate cause of emotional distress,character standing in Community, the Plaintiff suffered with harassment as a direct result of Defendants actions and deliberate indifference to Plaintiff's rights secured under the Fourth Amendment of The United States Constitution.

PRAYER FOR RELIEF

Wherefore, Plaintiff prays for relief as follows:

1. That the Court require Defendants Texas Department of Family Protective Service and City Dallas Police Department render a public apology to the Plaintiff;
2. That the Court require Defendant Texas Department of Family Protective Service to throw out falsified case in Texas District Court under Complaint No. 1300354W;
3. That the Court grant Plaintiff Compensatory Damages for \$35,000,000.00 for humiliation, emotional distress and all other damages caused by all Defendants;
4. That the Court grant Plaintiff punitive damages;
5. That the Court grant Plaintiff all her salary and employment benefit that she would have enjoyed had she not been.
6. That the Court grant Plaintiff a trial;
7. That the Court grant all other relief deemed just and proper.

This day of June 28, 2019

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Elaine Whigham Williams, Prose

Po Box 13012

2700 Buford Highway #25

Atlanta, Georgia 30324

(404)782-9186

elainewilliams@yahoo.com

**THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF
TEXAS
DALLAS DIVISION**

Elaine Whigham Williams,
Plaintiff

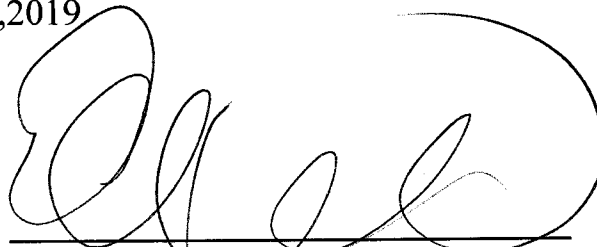
v. Case No.

City of Dallas
Texas Department of Family Protective Services
Medical City Hospital
Marsh McLennan Companies,
Defendant

REQUEST FOR TRIAL BY JURY

Plaintiff request Trial by Jury on all issues so triable.

This 29th day of June, 2019

A large, stylized handwritten signature in black ink, appearing to read 'Elaine Whigham Williams', is written over a horizontal line.

Elaine Whigham Williams
Po Box 13012
2700 Buford Highway #25
Atlanta, Georgia 30324

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
 Elaine Whigham Williams

DEFENDANTS
 Texas Department of Family Health Services, Dallas; Medical City Hospital & Marsh McLennan Companies, Inc., Dallas
 U.S. DISTRICT COURT
 NORTHERN DISTRICT OF TEXAS

(b) County of Residence of First Listed Plaintiff Fulton
 (EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Dallas
 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

319 - CV1587 - L

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 2 U.S. Government Defendant
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. 1983
 Brief description of cause:

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** _____
 CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

Elaine Whigham Williams
2700 Buford Hwy#25
Po Box 13012
Atlanta,Georgia 30324

June 29,2019

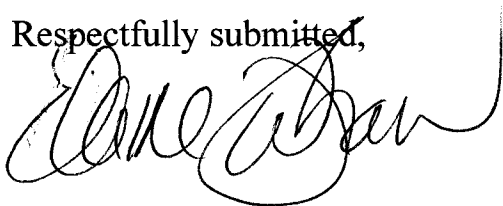
U.S. District Court Northern District of Texas
Attn: Clerk of Courts
1100 Commerce St. #1452
Dallas, Texas 75242

Re: Original filing Elaine Whigham Williams v. Texas Department of Family
Protective Services

Please find enclosed the original complaint for the above subject with the special
request of statute of limitations to toll the statute arising out of claim under 42
U.S.C. 1983. The enclosed also closed request for the granting of partial informa
Pauperis (reducing fee) to file complaint in the high Court of Texas.

If you have any questions regarding the enclosed please use any of the following
means of contact via U.S.Mail, by telephone at 404-782-9186 or vis email at
elainewilliams@yahoo.com.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Elaine Williams', written over the typed name.

Elaine Whigham William's

